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Lodged online and via email to: EPBC.Referrals@dcceew.gov.au

CC: Minister.watt@dcceew.gov.au

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RE: Centurion North Development (EPBC 2026/10419)

Queensland Conservation Council (QCC) welcomes the opportunity to comment on the referral of the Centurion North Development (EPBC 2026/10419) (**the Project**) by a subsidiary of Peabody Energy Australia Pty Ltd (**the Proponent**).

QCC is the peak body for environmental groups in Queensland. Since 1969, we have worked to support communities in protecting their environment and climate. Today we represent 61 groups and more than 20,000 members across the state, many of whom are already experiencing the impacts of climate change and unsustainable development on their communities, threatened species, and landscapes.

We are alarmed by the scale of environmental destruction proposed by this Project and the significant residual impacts acknowledged by the proponent. **We urge the Department of Climate Change, Energy, the Environment, and Water (the Department) to reject the Project** on the basis that it poses clearly unacceptable risks to matters of national environmental significance under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*, including water resources and threatened species and is inconsistent with Australia's climate commitments.

We are further concerned that the Proponent has inappropriately split the Project across several environmental assessments. The Project was deemed a Coordinated Project under the *State Development and Public Works Act 1971 (SDPWO Act)*, with a major EA amendment proposed to the Queensland Government concurrently to this EPBC referral. The Proponent notes the referral does not include the EA amendment or activities authorised under the existing EA. However, it does not seem like the previous EA or the proposed EA amendment have ever been referred under the EPBC Act.

This indicates that the Proponent has split up the project to avoid full assessment of the Project's impacts, which would be a clear breach of section 74A. **We therefore urge the Department to use powers under section 70 to require the Proponent to refer all activities detailed in their EA amendment for EPBC assessment.**

At the very least, the Department must declare the Project a controlled action with controlling provisions of:

- Listed threatened species and communities (sections 18 and 18A);
- Listed migratory species (sections 20 and 20A);
- Water resources (sections 24D and 24E);
- World Heritage properties (sections 12 and 15A);
- Commonwealth marine areas (sections 23 and 24A); and
- Great Barrier Reef Marine Park (sections 24B and 24C).

The reasons for these conditions are laid out below.

1. Significant impacts on threatened species, communities, and migratory species (sections 18, 18A, 20 and 20A)

The Bowen Basin is one of the most heavily cleared bioregions in Queensland, with the Project being one of 28 new or expanded coal mine projects in Queensland. The referral proposes clearing more than 633 hectares of land that is not marginal or degraded, but contains nationally significant biodiversity values. The northern section of the Project area intersects with a buffer area of a terrestrial State-wide biodiversity protection corridor.

The Project includes the following disturbance on threatened ecological communities (**TEC**):

- 493.61 ha of brigalow (*Acacia harpophylla* dominant and co-dominant);
- 528.69 ha of natural grasslands of the Queensland Central Highlands and the northern Fitzroy Basin; and

- 42.69 ha of semi-evergreen vine thickets of the Brigalow Belt (North and South), and Nandewar bioregions.

These TEC's are just part of large areas of remnant vegetation on the site that provide essential habitat for multiple federally listed threatened species, including:

- 3,384.72 ha of squatter pigeon habitat (*Geophaps scripta scripta*: vulnerable);
- 3,384.72 ha of koala habitat (*Phascolarctos cinereus*: endangered);
- 54.63 ha of ornamental snake habitat (*Denisonia maculata*: vulnerable);
- 1,163.35 ha of king bluegrass (*Dichanthium queenslandicum*: endangered);
- 76.24 ha of painted snipe habitat (*Rostratula australis*: endangered);
- 76.24 ha of Latham's snipe habitat (*Gallinago hardwickii*: vulnerable); and
- 3,398.89 ha of white-throated needletail habitat (*Hirundapus caudacutus*: vulnerable and migratory).

The following migratory species will also be significantly impacted with proposed clearing of:

- 3,398.89 ha of fork-tailed swift habitat (*Apus pacificus*);
- 76.24 ha of glossy ibis habitat (*Plegadis falcinellus*); and
- 3,398.89 ha of oriental cuckoo habitat (*Cuculus optatus*).

Biodiversity has continued to decline across all indicators in the years since the Federal Environmental Offsets Policy was introduced in 2012. QCC supports comprehensive reform of the offsets framework to consider irreplaceability and viability at a regional level. In particular, we urge the Department to consider Threatened Ecological Communities irreplaceable, and unable to be offset, in line with leading science¹. Additionally, the Department must consider the impacts of this project alongside the cumulative impacts² of the other coal and development proposals in the Bowen Basin to ensure survival of key species across the region.

It is clear from the referral which states that offsets will be investigated "in due course" that the proponent does not yet have a firm understanding of the impacts of the Project. This must be rigorously assessed before any decision is made.

Finding clearly unacceptable impacts for the Project would be consistent with the Albanese Government's commitment to prevent further extinctions.

¹ Ward, M., Aska, B., Venegas Li, R., Watson, J.E.M. (2024) [Principles and Rules for Implementing Spatial Zoning under the EPBC Act: A technical report produced to help guide terrestrial regional planning efforts in Australia.](#)

² Blakley et al, 2017, [Cumulative Effects Assessment](#), IAIA.

2. Unacceptable risks to water resources (sections 24D & 24E)

The Project poses serious and enduring risks to surface water and groundwater systems within the Fitzroy Basin catchment, Burdekin Basin catchment, and the downstream Great Barrier Reef (GBR) catchment. The Project does not currently adequately address cumulative or climate-amplified risks.

The Project would impact groundwater resources through drilling, dewatering and subsidence and fracturing associated with longwall mining.

In addition, cumulative impacts on surface water quality and the GBR are not properly addressed. Given the amount of mining activities in the Fitzroy Basin, and the additional and accelerating pressures on aquatic ecosystems and the GBR from climate change (to which this proposal will contribute), a thorough cumulative impact assessment is required. This assessment should establish current conditions and trends as well as thresholds and trigger levels for damage.

Given the cumulative pressures on water resources in the Fitzroy Basin, and the accelerating impacts of climate change on hydrological systems, the risks posed by this Project to water resources are unacceptable and irreversible. At a minimum, the Project must be declared a controlled action with controlling provisions under sections 24D and 24E of the EPBC Act.

3. Greenhouse gas emissions and climate impacts on World Heritage properties (sections 12 and 15A), and the Great Barrier Reef Marine Park (sections 24B and 24C)

Climate pollution is a key threatening process listed under the EPBC Act. The Minister must also consider social and economic matters, and the Project's contribution to climate change is a matter of profound public interest and long-term risk.

The Project would extract up to 7.1 million tonnes per annum of Run Of Mine (ROM) coal for export, and up to 10 petajoules per annum of coal seam gas (**CSG**). Over 26 years, the Proponent estimates this equates to 16.2 Mt Scope 1 and 2 CO₂e, and 327.8 Mt Scope 3 CO₂e. The mitigation measures outlined in the GHG abatement plan do not represent meaningful GHG abatement, are heavily reliant on the purchase of Australian Carbon Credit Units (**ACCUs**), and are unlikely to be compatible with the Safeguard Mechanism.

This will result in unacceptable impacts on Queensland, and Australia's, carbon emissions. Any new coal, thermal or metallurgical, is fundamentally incompatible with Australia's commitment under the Paris Agreement to pursue efforts to limit warming to 1.5°C. Globally, a 1.5°C aligned future means no new fossil fuel projects can, or need to be approved, according to the International Energy Agency³.

Locally, a 1.5°C aligned future is imperative for Queenslanders' human rights. The Queensland Land Court in the 2022 Youth Verdict vs Waratah decision recognised the impact that fossil fuel developments have on the human rights of Indigenous people, and children⁴.

In 2024, the average global temperature was 1.4°C above pre-industrial levels⁵, with Australian sea temperatures 0.93°C above average, the warmest ever recorded⁶. The impacts—including severe floods, cyclones, and bushfires—are already costing billions, with climate-related losses in Australia projected to reach \$584.5 billion by 2030⁷. \$171 billion of this is in Queensland. This is a conservative figure, covering reduced agricultural and labour productivity (e.g. when people can't work because of floods or heatwaves), health impacts, loss of land due to sea level rise, and impacts on infrastructure. Direct losses during natural disasters and damage to environmental assets are not covered in this estimate.

Other economic considerations include loss of jobs in the tourism sector. For example, the GBR, which is unlikely to survive any further warming of the planet, supports 77,000 jobs and has an estimated economic value of \$AU95 billion⁸. One of the greatest threats to the GBR is climate change⁹, and the Project's lack of meaningful climate pollution mitigation exacerbates this threat.

In 2025, multiple record-breaking extreme weather events pummelled Queensland. Estimates of damage by insurance company AON include insured losses of \$233 million from north Queensland floods and \$1 billion from Cyclone Alfred, and economic losses of \$340 million from north Queensland flooding and \$1.3 billion from Cyclone Alfred¹⁰.

³ IEA, 2021, [Net Zero by 2050](#).

⁴ Queensland Human Rights Commission, 2023, [Case Note: Waratah Coal Pty Ltd v Youth Verdict Ltd](#).

⁵ World Meteorological Organisation, 2026, [WMO confirms 2025 was one of warmest years on record](#).

⁶ Bureau of Meteorology, 2026, [Annual Climate Statement 2025, Australian Government](#).

⁷ Kompas et al, 2019, [Australia's Clean Energy Future: Costs and Benefits](#), University of Melbourne.

⁸ DCCEEW, 2025, [Great Barrier Reef valued at \\$95 billion, supports 77,000 jobs](#).

⁹ GBRMPA, 2024, [Threats to the Reef](#).

¹⁰ Aon, 2025, [Q1 Global Catastrophe Recap](#).

Approving a new coal mine that locks in emissions is incompatible with the EPBC Act's purpose to protect the environment, particularly in the context of current and projected climate harms. It would exacerbate climate-driven impacts on World Heritage properties and the Great Barrier Reef Marine Park.

Conclusion

The Project involves serious and irreversible harm to Matters of National Environmental Significance. We therefore urge the Department to:

1. Reject the Project due to its clearly unacceptable impacts to protected species and water resources, and its incompatibility with a safe climate future.
2. If the Project does proceed to the assessment stage it should be declared a 'controlled action' and be assessed with the highest levels of scrutiny that the EPBC Act can apply with controlling provisions of sections 18, 18A, 20, 20A, 24D, 24E, 12, 15A, 23, 24A, 24B and 24C.
3. At the very least, the Department must use powers under section 70 to require the Proponent to refer all activities detailed in their EA amendment for EPBC assessment.

Yours sincerely,



Charlie Cox
Coal and Gas Campaigner
Queensland Conservation Council